

REMARKS

This is a full and timely response to the outstanding Advisory Action and the final Office Action mailed December 20, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 102(b)

Claims 1, 5-6, 8-11, and 17-20 have been rejected under 35 U.S.C. § 102(b) as being anticipated by *Takeuchi* (U.S. Pat. No. 5,860,644). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(b).

In the present case, not every feature of the claimed invention is represented in the *Takeuchi* reference. Applicant discusses the *Takeuchi* reference and Applicant's claims in the following.

Applicant's claim 1, for example, provides as follows (emphasis added):

An imaging device, comprising:
a main unit that includes a print mechanism and a media input tray; and
a physically separate auxiliary unit that is positioned below the main unit, couples with the same in stacked configuration, and physically supports the main unit, the auxiliary unit including an integral document finishing mechanism and a further media input tray, wherein the document finishing mechanism is accessible from an environment outside the imaging device through a slot provided in the auxiliary unit, wherein the auxiliary unit has a footprint that is substantially the same as a footprint of the main unit.

Takeuchi discloses a base B, on which a printer P is supported. See col. 2, lines 29-31. The stacker S and the feeder F are adapted to be enclosed in the base B below the printer P. See col. 2, lines 65-66. With regard to one aspect of pending claim 1, the main unit of *Takeuchi* does not include a media input tray.

Further, Applicant respectfully submits that none of the cited art references appears to disclose a configuration, in which an auxiliary unit provides a slot, which

enables access from an exterior of the device to a document finishing mechanism. In addition to this, none of the references seemingly disclose a configuration, in which a main unit including a print mechanism and an auxiliary unit including a document finishing mechanism have substantially the same footprint.

One advantage of the claimed subject matter is that an imaging device can be reconfigured in a simple and flexible way by a user. As the imaging device has a document finishing mechanism, which is accessible from the exterior through a slot, the claimed embodiment does not need an automatic paper advance mechanism in order to convey a sheet of paper from the printing mechanism to the document finishing mechanism. Hence, a user need not to take care of the configuration of such an automatic paper advance mechanism, which is implemented in well-known printers with such an additional functionality. Therefore, a user can implement a dedicated auxiliary unit including a dedicated document finishing mechanism, e. g. a stapler or a binding mechanism, in the claimed embodiment and replace the implemented auxiliary unit by another auxiliary unit in a simpler way than in a well-known printer with such an additional functionality.

Additionally, the claimed device is simpler and more cost-efficient than a known printer with such an additional functionality, because it does not need an automatic paper advance mechanism. Furthermore, the footprint of such an imaging device is less than the footprint of a printer with such an additional functionality, as there is no need to convey a paper from the printer to the document finishing mechanism via an automatic paper advance system as implemented in well-known printer with such an additional functionality. Moreover, since the main unit and the auxiliary unit of the claimed imaging device have substantially the same footprint, the footprint of the imaging device is less than the footprint of a well known printer with such an additional functionality, as disclosed in the cited references.

For at least the foregoing reason, claim 1 is allowable over *Takeuchi*, as are claims 2-16 and 29 that depend from claim 1.

II. Canceled Claims 17-28

Claims 17-28 are canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to these claims are rendered moot. Applicant takes this action merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicant reserves the right to pursue the subject matter of these canceled claims in a continuing application, if Applicant so chooses, and does not intend to dedicate any of the canceled subject matter to the public.

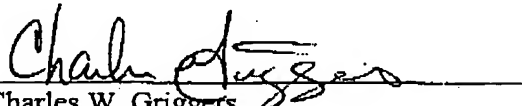
III. Newly Added Claims 30-39

Newly added independent claim 30 is believed to be allowable over the cited art for at least the reasons the discussed above with regard to independent claim 1. In particular, the cited references fail to teach or suggest at least an auxiliary unit for an imaging device that may be located physically separate from a main unit and may also be coupled in a stacked configuration with the main unit, where the auxiliary unit comprises an integral document finishing mechanism accessible from outside the imaging device through a slot provided in the auxiliary unit. For at least the foregoing reason, claim 30 is allowable, as are claims 31-39 that depend from claim 30.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,


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